

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

PETER W. HAYES,

Defendant.

)
)
)
)
)
)
)

Criminal Action #14-39-RGA

NOTICE OF MOTION

TO: Robert F. Kravetz, Jr., Esquire
Leslie Wolfe, Esquire
Assistant United State's Attorneys
1007 N. Orange Street, Suite 700
Wilmington, DE 19801

PLEASE TAKE NOTICE that the within Motion for Continuance will be
presented to the Honorable Richard G. Andrews as soon as counsel can be heard.

/s/ Eugene J. Maurer, Jr.
Eugene J. Maurer, Jr.
1201-A King Street
Wilmington, DE 19801
302-652-7900

Date: March 3, 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

PETER W. HAYES,

Defendant.

)
)
)
)
)
)
)

Criminal Action #14-39-RGA

MOTION FOR CONTINUANCE

COMES NOW, the defendant through his attorney, Eugene J. Maurer, Jr., and moves for a continuance of the sentencing scheduled in the above. The bases of this motion are as follows:

- 1 The defendant entered a plea of guilty to bank bribery on November 13, 2014 before Your Honor. Sentencing is presently scheduled for March 17, 2015.
- 2 The defendant is a former employee of the Wilmington Trust Company and the prosecution of the defendant arose out of an investigation of that company.
- 3 The defendant has met with the prosecutors on several occasions and it is probable that the defendant would be a witness for the government in the event that there would be a future indictment of the bank or other related individuals.
- 4 In addition, other Wilmington Trust employees have pled guilty and they have not yet been sentenced. The defense believes that it would be important for the Court to see the relative degrees of culpability as they relate to the defendant and other guilty pleading defendants before a sentence is imposed. It will ultimately be the defendant's position that he is far less culpable than others who have entered guilty pleas.

- 5 In order to allow the defendant's continued cooperation in the investigation and further in order to provide the Court with a full picture of the defendant's responsibility vis a vis others, it is respectfully suggested that sentencing in this matter should be deferred.
- 6 Counsel has spoken with Robert Kravetz, Esquire, attorney for the government, and he concurs that a continuance of the sentencing would be appropriate and has no objection.

/s/ Eugene J. Maurer, Jr.
Eugene J. Maurer, Jr., I.D. #821
1201-A King Street
Wilmington, DE 19801

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

PETER W. HAYES,

Defendant.

)
)
)
)
)
)
)

Criminal Action #14-39-RGA

ORDER

AND NOW, TO WIT, this _____ day of _____, 2015, the
foregoing Motion having been heard and considered, it is hereby

ORDERED _____

J.